

<u>DATE</u>	<u>DESCRIPTION</u>	<u>TIME</u>	<u>ATTY</u>	<u>RATE</u>	<u>TOTAL</u>
6/23/2014	Initial in person meeting with client, review of all of clients notes, telephone conference to Magistrate Judge	3.8	MSG	450	1710
6/25/2014	Email correspondence with MSG and client regarding deadlines and retainer	0.2	PR	125	25
6/27/2014	Review of paperwork from client; meeting with paralegal; phone call with opposing counsel	1.7	MSG	450	765
6/27/2014	Drafted and filed notice of appearance and letter requesting adjournment of initial conference, phone call with MSG and opposing counsel, meeting with MSG regarding case, review of complaint, review of both Judge's individual rules of practice	2.6	PR	125	325
6/30/2014	Drafted letter of representation, phone call with court regarding letter requesting adjournment, R&R of order granting adjournment, email correspondence with MSG regarding same and calendar of new dates	1.3	PR	125	162.5
7/2/2014	Review complaint filed by client, phone call with client	0.6	PR	125	75
7/3/2014	Email correspondence with MSG regarding phone conference and deadlines	0.2	PR	125	25
7/8/2014	Interviewed client re: factual background for complaint, drafted complaint	1.8	MSG	450	810
7/9/2014	Meeting with client re: factual background for complaint	2.2	MSG	450	990
7/10/2014	Draft complaint, discussion with client	3.2	MSG	450	1440
7/11/2014	Drafted complaint	3.8	MSG	450	1710
7/14/2014	Draft complaint, meeting with client	7.8	MSG	450	3510
7/14/2014	Drafted and filed letter requesting adjournment of deadline to amend complaint, email correspondence with MSG regarding same and phone call with client	0.8	PR	125	100
7/15/2014	Drafted complaint	6.3	MSG	450	2835
7/21/2014	Drafted complaint	1.8	MSG	450	810
7/21/2014	Email correspondence and phone call with MSG regarding case	0.2	PR	125	25
7/22/2014	Draft complaint, meeting with client	5.8	MSG	450	2610
7/23/2014	Draft complaint	4.1	MSG	450	1845
7/24/2014	Draft the complaint, meeting with client	5.4	MSG	450	2430
7/25/2014	Review of first draft of amended complaint	0.8	PR	125	100
7/28/2014	Finalized and filed complaint	1.6	MSG	450	720

7/30/2014	Correspondence with client and with NYSHRD and opposing counsel	0.3	MSG	450	135
8/1/2014	Telephone conference with opposing counsel, communication with court	0.2	MSG	450	90
8/4/2014	Email correspondence with Joan from NYSDHR regarding dismissal of case	0.2	PR	125	25
8/5/2014	Email correspondence with MSG, draft and fax and email of letter requesting dismissal of NYS Division of Human Rights case	0.7	PR	125	87.5
8/13/2014	Telephone conference with opposing counsel, communication with	0.2	MSG	450	90
8/19/2014	Telephone conference to client, telephone conference with opposing counsels	0.4	MSG	450	180
8/19/2014	R&R of stipulation regarding extension of time to answer amended complaint, signed and email back to opposing counsel	0.2	PR	125	25
8/20/2014	Signed new stip and sent to opposing counsel, R&R of motion to transfer, email correspondence with MSG and opposing counsel	0.5	PR	125	62.5
8/22/2014	Email correspondence with MSG and ATM regarding motion to transfer, R&R of third letter motion to adjourn conference	0.6	PR	125	75
8/26/2014	Review of motion to transfer, research, drafted opposition	1.4	MSG	450	630
9/2/2014	Review of motion to transfer, research, drafted opposition	1.4	MSG	450	630
9/3/2014	Research, drafted opposition to motion to remove case	2.1	MSG	450	945
9/4/2014	Research motion to change venue, drafted opposition on motion to change venue	0.7	MSG	450	315
9/4/2014	Emails and meeting with MSG regarding adding parent company to complaint, phone call with client	0.4	PR	125	50
9/5/2014	Conference with opposing counsel, conference with client re: updates at job, research on motion to dismiss	1.1	MSG	450	495
9/8/2014	Conference with opposing counsel, conference with client re: updates at job, research on motion to dismiss	1.1	MSG	450	495
9/9/2014	Review of motion to change venue research, drafted motion	0.8	MSG	450	360
9/11/2014	Review of court order, conference with client, re: scheduling and complaint drafting	0.3	MSG	450	135

9/11/2014	Drafted and filed opposition to Motion to transfer	1.4	MSG	450	630
9/22/2014	Review of reply to motion	0.4	MSG	450	180
9/30/2014	Conference with opposing counsel re: errors in complaint, extension	0.3	MSG	450	135
9/30/2014	Final revisions and electronically filed amended complaint, emails with MSG and client regarding same, filed order granting leave to file amended complaint, rule 7.1 statement and letter requesting summons	1.5	PR	125	187.5
10/2/2014	Review of decision, email to client	0.1	MSG	450	45
10/7/2014	Review of partial motion to dismiss	0.8	MSG	450	360
10/7/2014	Email correspondence and phone calls with MSG and opposing counsel regarding initial conference, draft and electronic filing of letter requesting adjournment of same	1	PR	125	125
10/13/2014	Phone calls with opposing counsel and meeting with MSG regarding preliminary conference adjournment	0.4	PR	125	50
10/14/2014	Phone calls with opposing counsel, MSG and Judge's chambers regarding preliminary conference adjournment	0.7	PR	125	87.5
10/16/2014	Email correspondence and phone call with Judge and opposing counsel regarding conference to be adjourned	0.2	PR	125	25
10/17/2014	Phone call with opposing counsel regarding new dates for preliminary conference	0.2	PR	125	25
10/20/2014	Drafted and electronically filed letter requesting adjournment of PC and R&R of order granting same, phone calls with opposing attorney regarding same	0.8	PR	125	100
10/23/2014	R&R of motion to dismiss with MOL and Declaration	0.2	PR	125	25
10/26/2014	Review of partial motion to dismiss	0.8	MSG	450	360
10/28/2014	Phone call with client and research on e-courts, R&R of order postponing initial conference	0.2	PR	125	25
10/31/2014	Correspondence with opposing counsel and stip of adjournment re: motion to dismiss	0.3	MSG	450	135
10/31/2014	Correspondence with opposing counsel and stip of adjournment re: motion to dismiss	0.3	MSG	450	135
10/31/2014	Draft of letter requesting extension of time to file opposition to motion to dismiss	0.5	PR	125	62.5
11/7/2014	Review of motion, drafted opposition	2.3	MSG	450	1035

11/10/2014

	Email correspondence with MSG regarding opposition to motion to dismiss, electronically filed letter to Judge regarding same, Memo of law and declaration in opposition to motion to dismiss	1.4	PR	125	175
12/29/2014	Reviewed and edited discovery drafts, review of complaint	1.1	MSG	450	495
2/5/2015	Conference with client	0.4	MSG	450	180
3/5/2015	Review of decision	0.5	MSG	450	225
5/4/2015	Reached out to opposing counsel re status	0.3	MSG	450	135
9/9/2015	Discussion with client, discussion with adversary re: continued retaliation, conference issues, preliminary disclosures	0.9	MSG	450	405
9/10/2015	Telephone conference with client, retaliation Issues	0.7	MSG	450	315
9/11/2015	Pre-court appearance; meet an confer with opposing counsel, filled out pre conference schedule, review of pleadings and decision	1.4	MSG	450	630
9/17/2015	Prepare for and attend court appearance, discussion with adversary	3.2	MSG	450	1440
9/17/2015	Reviewed and finalized rule 26 initial disclosures	0.3	PR	125	37.5
9/18/2015	Emails with psych evaluator and email to client regarding scheduling for same, phone call with client regarding same and status of case	0.3	PR	125	37.5
9/28/2015	Drafted discovery demands, sent check to Dr. Goldstein for psych evaluation with cover letter	1.8	PR	125	225
9/29/2015	Reached out to opposing counsel re: status	0.9	MSG	450	405
9/30/2015	Phone calls and emails with client regarding update on previous psych records to send to new evaluator new evaluator	0.2	PR	125	25
11/12/2015	Prepare for discovery meeting with client	0.8	MSG	450	360
11/13/2015	Meeting with client, draft discovery, review of documents produced	4.3	MSG	450	1935
11/28/2015	Emails and phone calls with client and Dr, Goldstein regarding psych evaluation dates	0.3	PR	125	37.5
12/14/2015	Draft discovery demands	1.3	MSG	450	585
1/12/2016	supplemented document production and sent to opposing counsel	0.2	PR	125	25
1/14/2016	Review of and edit to discovery drafts, discussion with CS, communications to client	1.4	MSG	450	630
1/14/2016	Email to client and meeting with MSG regarding discovery demands	0.2	PR	125	25

1/15/2016	Review of discovery demands with MSG to go out to opposing counsel	0.8	PR	125	100
1/25/2016	Review of letter re: discovery deficiencies, review of discovery	0.3	MSG	450	135
2/2/2016	Conference with opposing counsel re: discovery issues	0.6	MSG	450	270
2/15/2016	Meeting with client, discovery	1.4	MSG	450	630
2/19/2016	Draft letter concerning on-going retaliation	1.3	MSG	450	585
2/23/2016	Research	0.8	MSG	450	360
2/25/2016	Research on use of N word	1.3	MSG	450	585
2/28/2016	Drafted letter to opposing counsel re: continued retaliation	0.8	MSG	450	360
3/7/2016	Prepare for and attend court appearance	3.2	MSG	450	1440
3/7/2016	Discussion with client	0.4	MSG	450	180
3/8/2016	Discussion with client, strategy on depositions	1.4	MSG	450	630
3/21/2016	Review complaint and file in preparation for deposition on March 30	1.5	GV	350	525
3/25/2016	Prep client for deposition	3	MSG	450	1350
3/29/2016	Review file in preparation for Plaintiff's deposition	2	GV	350	700
3/29/2016	Draft deficiency letter	2	GV	350	700
3/30/2016	Attend Plaintiff's deposition	8	GV	350	2800
3/31/2016	Review of and edits of Deficiency letter	0.6	MSG	450	270
3/31/2016	Attend deposition of Plaintiff, follow up with Client	10.3	MSG	450	4635
4/2/2016	Email to client	0.1	GV	350	35
4/4/2016	Research and draft Response to Defendants' Deficiency letter	2	GV	350	700
4/4/2016	Phone call with client	0.25	GV	350	87.5
4/4/2016	Review and revise draft of response to deficiency Letter before sending to opposing counsel	0.5	MSG	450	225
4/5/2016	Conference with MSG re: Defendant deposition	0.6	GV	350	210
4/5/2016	Discuss scheduling issues with opposing counsel, prepared fro Jandovitz deposition	1.5	MSG	450	675
4/5/2016	Discuss Scheduling issues with opposing counsel, prepared fro Jandovitz deposition	1.5	MSG	450	675
4/5/2016	Conference with GMV re: Jandovitz deposition	0.6	MSG	450	270
4/7/2016	Prepare for and attend deficiency conference	0.8	MSG	450	360
4/9/2016	Communication with adversary re: joint letter to judge, scheduling issues, review of documents receive	1.1	MSG	450	495
4/13/2016	Discussion with client re: IME	0.4	MSG	450	180
4/14/2016	Review of letter to court, draft letter to court	0.6	MSG	450	270

4/19/2016	Phone call with client re: upcoming depositions	0.3	GV	350	105
5/3/2016	Conference with Megan about discovery schedule and order from judge	1	GV	350	350
5/3/2016	Conference with GV re: discovery	1	MSG	450	450
5/5/2016	Review Defendants' supplemental production	2	MSG	450	900
5/6/2016	Review Defendants' supplemental production; Index supplement document production; Draft follow up deficiency letter; Research	3.2	GV	350	1120
5/6/2016	Email corr with opp counsel	0.2	MSG	450	90
5/9/2016	Draft Second Draft of Deficiency letter	1	GV	350	350
5/9/2016	Communication with adversary re: joint letter to judge, scheduling issues, review of documents receive	1.1	MSG	450	495
5/9/2016	Review second deficiency notice	0.3	MSG	450	135
5/10/2016	Email corr with opp counsel; Review second set of supplemental document production by defendants	1	GV	350	350
5/10/2016	Prepared for Torche deposition, review of additional production, correspondence with adversary and client	2.4	MSG	450	1080
5/11/2016	Review of all documents produced, organized documents, prepared for Debbie Troche deposition	3.7	MSG	450	1665
5/16/2016	Review of document production in preparation for depositions	2.4	MSG	450	1080
5/17/2016	Meeting with client to go over supplemental document production; Draft letter to court requesting pre-motion conference	3	GV	350	1050
5/17/2016	Email corr with opposing counsel	0.2	MSG	450	90
5/18/2016	Meeting with client, further review of latest interview documents	1.3	MSG	450	585
5/25/2016	Prepared for and attended the deposition of Juan Vizcaino, follow up with client, review of OT records pertaining to witness testimony, discussion with expert witness and opposing counsel, re: deposition payment	6.4	MSG	450	2880
5/26/2016	Review of transcript received	1.4	MSG	450	630
5/27/2016	Conference call with Judge and opposing counsel re: motion to compel	0.5	GV	350	175
5/27/2016	Prepared for and attended conference with Court re: discovery issues	1.4	MSG	450	630
5/31/2016	Prepared for deposition of Dr. Goldstein, review of report, and Cv	0.8	MSG	450	360

6/1/2016	Prepared for and attended the deposition of Dr. Robert Goldstein	6.6	MSG	450	2970
6/1/2016	Notes to file re: trial issue	0.9	MSG	450	405
6/6/2016	Draft Notice of Motion for Motion to Compel discovery	0.25	GV	350	87.5
6/7/2016	Research for Motion to Compel- additional case law on compelling personnel files and standard for motion to compel	1.25	GV	350	437.5
6/7/2016	Draft attorney declaration for motion to compel	1	GV	350	350
6/8/2016	Work on first draft of Motion to Compel memo of law	1.5	GV	350	525
6/8/2016	Phone conference with client	0.5	GV	350	175
6/9/2016	Draft and finalize memo of law for motion to compel	4	GV	350	1400
6/9/2016	Review; Draft and Edit Motion to Compel	1.3	MSG	450	585
6/10/2016	Review of confidentiality stipulation	0.4	MSG	450	180
6/13/2016	Prepare for deposition of Bob Jandovotz	1.6	MSG	450	720
6/14/2016	Back and forth with Adversaries on whether deposition will go forward or not given discovery motion, research, draft letter to Court	1.7	MSG	450	765
6/21/2016	Draft letter to court, communication with adversary	0.3	MSG	450	135
6/23/2016	Review defendants' opposition papers to motion to compel	0.6	GV	350	210
6/24/2016	Review of Opposition to Motion to Compel	0.9	MSG	450	405
6/25/2016	Email corr with opp counsel	0.1	MSG	450	45
6/27/2016	Draft reply memo for motion to compel	3	GV	350	1050
6/27/2016	Review and Edit of Draft Reply	0.4	MSG	450	180
7/8/2016	Phone call with client	0.25	GV	350	87.5
7/11/2016	Discovery Issues	0.7	MSG	450	315
7/15/2016	Email with Client	0.1	GV	350	35
7/26/2016	Email correspondence with opposing counsel re: Defendants' privilege log.	0.1	GV	350	35
7/26/2016	Review of privilege log	0.3	MSG	450	135
7/28/2016	Email corr with opposing counsel	0.1	MSG	450	45
8/1/2016	Review of transcript, preparation of depositions, strategy discussion	1.4	MSG	450	630
8/3/2016	Review decision and order on motion to compe; Email corr with client	0.6	GV	350	210
8/3/2016	Email corr with opposing counsel	0.1	MSG	450	45
8/4/2016	Draft application for attorneys' fees stemming from Motion to Compel	4	GV	350	1400
8/4/2016	Draft Goddard declaration for motion for attorneys fees	3	GV	350	1050

8/4/2016	Review personnel files produced by Defendant and discussions with client re: same	2	MSG	450	900
8/5/2016	Finalize memo and motion papers for motion for attorneys fees	3	GV	350	1050
8/5/2016	Draft complaint, discussions with client, review of first right to sue letter and discussion with EEOC	1.6	MSG	450	720
8/5/2016	Draft complaint, discussions with client; review of first right to sue letter and discussion with EEOC	1.6	MSG	450	720
8/10/2016	Email corr with opp counsel	0.1	MSG	450	45
8/11/2016	Review Defendants' opposition papers to motion for attorneys' fees	1.5	GV	350	525
8/12/2016	Phone call with client	0.2	GV	350	70
8/12/2016	Draft letter to court re: courtesy copy of motion papers for motion for attorneys' fees	0.1	GV	350	35
8/12/2016	Conference with client, prepped for Jandovitz deposition	2.2	MSG	450	990
8/15/2016	Prepared for Jandovitz Deposition, review of discovery, review of complaint	2.7	MSG	450	1215
8/15/2016	Email corr with opp counsel	0.1	MSG	450	45
8/16/2016	In person conference to prep for deposition of Bob Jandovitz	1	GV	350	350
8/16/2016	Review document production and pull relevant documents for deposition of Bob Jandovitz	2	GV	350	700
8/16/2016	Prepared for the deposition of Robert Jandovitz	6.8	MSG	450	3060
8/17/2016	Review depo transcript of Juan Vizcaino and draft post EBT discovery demands	1.5	GV	350	525
8/17/2016	Prepared for and deposed Robert Jandovitz	10.2	MSG	450	4590
8/18/2016	Notes to file re: deposition, main points of case	1.3	MSG	450	585
8/18/2016	Review Vizcaino post EBT demands	0.3	MSG	450	135
8/19/2016	Review and revise EBT Notice for Adolph McBean	0.25	GV	350	87.5
8/19/2016	Email corr with opp counsel re: trading deposition transcripts	0.1	GV	350	35
8/22/2016	Phone call with client	0.2	GV	350	70
8/23/2016	Draft letter requesting extension of discovery to court; Strategy Discussion Re: Depositions	0.8	GV	350	280
8/23/2016	Review of document production, discussion with GV re: necessity of Adolph McBean and Nicole Copeland depositions, letter to court requesting same, email to adversaries, review of disco dry letter	0.4	MSG	450	180

8/24/2016	Email correspondence with opp counsel re: extending discovery deadline	0.1	GV	350	35
8/24/2016	Revise letter to court asking for extension of time to complete discovery	0.5	GV	350	175
8/24/2016	Read through and take notes on depo transcript of Robert Jandovitz	4	GV	350	1400
8/24/2016	Draft letter to opp re: Post-EBT demands from Jandovitz deposition	0.6	GV	350	210
8/24/2016	Review of and edits to draft letters prepared by GV, re: outstanding discovery, discussion with GV	0.4	MSG	450	180
8/25/2016	Finalize letter to opp memorializing post ebt demands from Jandovitz deposition	0.3	GV	350	105
8/25/2016	Phone call with Judge Fox's clerk re: letter requesting discovery extension	0.2	GV	350	70
8/25/2016	Email corr with Judge Crotty's courtroom deputy and opposing counsel re: application for discovery extension	0.2	GV	350	70
8/25/2016	Review defendants' letter in opposition to our application to extend discovery	0.3	GV	350	105
8/25/2016	Email corr with opp counsel	0.1	MSG	450	45
8/26/2016	Review Order from Judge Crotty on application to extend discovery	0.1	GV	350	35
8/26/2016	Settlement discussion with opposing counsel	0.8	MSG	450	360
8/30/2016	Conference with MSG re: Troche deposition	0.25	GV	350	87.5
8/30/2016	Prepared for deposition, review of all transcripts, worked on overall case strategy (inconsistencies along the way by Defendants	6.5	MSG	450	2925
8/31/2016	Prepared for and took deposition of Devotah Troche, follow up with client, review of Jandovitz deposition after Troche deposition for inconsistencies	10.7	MSG	450	4815
9/13/2016	Email corr with opp counsel	0.3	MSG	450	135
9/14/2016	Review correspondence from opp counsel re: response to post EBT demands after J. Vizcaino's depositions; Discuss with MSG	0.4	GV	350	140
9/28/2016	Review Defendants' supplemental production	0.6	GV	350	210
9/28/2016	Review Defendants' supplements doc production	0.4	MSG	450	180
9/28/2016	Email corr with opp counsel	0.1	MSG	450	45
9/29/2016	Conference with MSG re: McBean deposition and issue/document spot for McBean deposition	1	GV	350	350

9/30/2016	Prepared and took deposition of Adolph McBean	9.7	MSG	450	4365
10/3/2016	Review of discovery issue	0.4	MSG	450	180
10/11/2016	Meeting with client	1	GV	350	350
10/17/2016	Developed spreadsheet re: OT HOURS	0.6	MSG	450	270
10/17/2016	Meeting with client	1.4	MSG	450	630
10/31/2016	Review Defendants' 56.1 Summary Judgment Statement	2.5	GV	350	875
10/31/2016	Phone call with client	0.2	GV	350	70
11/1/2016	Review Defendants' summary judge Memo of Law and supporting affidavits	3	GV	350	1050
11/1/2016	Prepare 3 working copies of Defendants' Motion for SJ; Letter to client re: enclosure of same	1	PR	125	125
11/9/2016	Finalize and efile letter to the court	0.4	PR	125	50
11/10/2016	Outline issues in Defendants' motion for summary judgment and applicable responses thereto	2	GV	350	700
11/11/2016	Research for opp to MSJ	2.5	GV	350	875
11/18/2016	Email corr with client	0.1	GV	350	35
11/18/2016	Review of SJ motion	1.6	MSG	450	720
11/21/2016	Phone conference with client to go over Defendants' Rule 56.1 Statement of Facts submitted with Defendants' motion for summary judgment	1.75	GV	350	612.5
11/22/2016	Review client's handwritten notes and diary/calendar entries in prep for opp to motion for summary judgment and 56.1 counter-statement of facts	3	GV	350	1050
11/22/2016	Phone call with client re: submission of new grievance for not offering her OT during	0.25	GV	350	87.5
11/25/2016	Review and revise Affidavit of Fred Gaffney submitted in opposition to Defendants' Motion for Summary Judgment	1	GV	350	350
11/26/2016	Review of all deposition transcripts, EEOC submissions, and Internal investigation notes	7.2	MSG	450	3240
11/27/2016	Witness interviews, drafted witness affidavits, arranged for couriers, etc	13.2	MSG	450	5940
11/28/2016	Continue drafting skeleton outline of memo of law in opposition to Defendants' motion for summary judgment	3.5	GV	350	1225
11/28/2016	Review and revise Affidavit of Fred Gaffney submitted in opposition to Defendants Motion for Summary Judgment	1	GV	350	350

11/29/2016	Continue drafting memo of law in opposition to Defendants motion for summary judgment	8	GV	350	2800
11/29/2016	Complete first draft of memo of law in opposition to motion for summary judgment	7	GV	350	2450
11/29/2016	Drafted sj motion opposition	12.4	MSG	450	5580
11/29/2016	Edit MSGs Declaration in Opposition to Defendants Motion for SJ and add list of exhibits	0.8	PR	125	100
11/30/2016	Finalize memo of law in opposition to motion for summary judgment and review all exhibits and rule 56.1 statement of facts before filing	4	GV	350	1400
11/30/2016	Drafted SJ rule 56.1 statement, assembled exhibits, reviewed client Affidavit	9.2	MSG	450	4140
11/30/2016	Prepare Exhibits for Opposition to Defendants SJ Motion; Edit Exhibits for Opposition to Defendant's SJ Motion; Edit MSGs Declaration; Review and Edit Rule 56 Counter-Statement	4.9	PR	125	612.5
12/1/2016	Finalize memo of law in opposition to motion for summary judgment and review all exhibits and rule 56.1 statement of facts before filing	4	GV	350	1400
12/1/2016	Edit Exhibits; Edit and finalize Rule 26 Counter-Statement; Edit and finalize MSG Declaration; Finalize all exhibits and split for efilng purposes; Efile all documents for Opp to SJ Motion	3.1	PR	125	387.5
12/8/2016	Solving incorrect affidavit problem, multiple discussions with Allison	1.4	MSG	450	630
12/22/2016	Return client's phone call - left voicemail	0.1	MSG	450	45
12/22/2016	Read and review Defendants Motion for Summary Judgment Reply papers	2	MSG	450	900
12/27/2016	Put together Opposition papers to send copy to Judge; Call to Court Re: Judge s information	1.4	PR	125	175
12/28/2016	Phone call with client re: new grievance against union	0.2	GV	350	70
5/5/2017	Read and review Judge Foxs report and recommendation on Defendants motion for summary judgment	0.5	GV	350	175
5/5/2017	Read and review Report and Recommendation; Discussions with client	0.7	MSG	450	315
5/8/2017	Email correspondence with client re: forwarding Judge Foxs report and recommendation	0.1	GV	350	35
5/18/2017	Email corr with opp counsel	0.1	MSG	450	45

5/18/2017	Prepared for and had phone call with opposing counsel	0.8	MSG	450	360
5/31/2017	Read and analyze Defendants objections to MSJ report and recommendations	0.6	GV	350	210
6/8/2017	Draft Response to Defendants objections to MSJ Report and Recommendation	3	GV	350	1050
6/9/2017	Finalize response to Defendants objections to MSJ Report and Recommendation	2.5	GV	350	875
6/9/2017	Review response to Defendants' objections to MSJ Report and Recommendation	1	MSG	450	450
6/13/2017	Return clients call- left voicemail giving case update	0.1	GV	350	35
9/15/2017	Phone call with client re: ongoing harassment	0.2	GV	350	70
9/18/2017	Phone call with client re: ongoing issues and updated requests for discovery	0.1	GV	350	35
9/19/2017	Read and review Opinion and Order partially adopting report and recommendation	0.75	GV	350	262.5
9/19/2017	Email corr with opp counsel	0.1	MSG	450	45
10/11/2017	In-office meeting with client; type up notes for proposed eeoc charge for retaliation	3.6	GV	350	1260
11/27/2017	Prepared for trial strategy meeting, review of decisions and SJ motion	2.6	MSG	450	1170
11/28/2017	Trial meeting with MSG and NC	4	GV	350	1400
11/28/2017	Email correspondence with opposing counsel	0.1	GV	350	35
11/28/2017	Trial meeting with MSG and NC	3	GV	350	1050
11/28/2017	Attended trial meeting, communications with clients and witnesses	4	MSG	450	1800
12/7/2017	Search RMC record for all Fred Gaffney and Fred Panniccia references	5	GV	350	1750
12/8/2017	Email corr with opposing counsel	0.1	GV	350	35
12/8/2017	Search CL record for all references to Fred Gaffney and Fred Panniccia	6	GV	350	2100
12/28/2017	Begin first draft of proposed joint pre-trial order	4	GV	350	1400
1/3/2018	Review Defendant's pre-trial motion in limine	0.7	GV	350	245
1/4/2018	Email corr with client	0.1	GV	350	35
1/5/2018	Email corr with opp counsel	0.1	MSG	450	45
1/5/2018	Review defendant's motion in limine; Review docket, orders and judge's rule re: upcoming pre-trial and trial deadlines and calendar same	0.8	PR	125	100
1/10/2018	Review Court docket, orders and Judge's Rules re: pre-trial submissions	0.4	PR	125	50
1/16/2018	Legal research on Eggshell plaintiff in response to Motion in Limine. Review of correspondence with Adversary and review of judge's order	3.2	MSG	450	1440

1/19/2018	E-mails with opposing counsel re: deposition transcript of Dr. Goldstein; Receipt of deposition transcript from Dr. Goldstein	0.8	PR	125	100
1/31/2018	Email correspondence with client	0.1	GV	350	35
1/31/2018	Review all discovery and finalize exhibit list for JPTO	4	GV	350	1400
1/31/2018	Emails with opposing counsel and trial team	0.2	GV	350	70
1/31/2018	Research serving subpoena on out of state witness to testify in state	0.5	GV	350	175
1/31/2018	Review and take notes/make citation chart on transcript of Dr. Goldstein	3	MSG	450	1350
2/1/2018	Conference call with MSG and trial counsel NC	2.5	GV	350	875
2/1/2018	Review proposed jury instructions	1.2	GV	350	420
2/2/2018	Conference call with MSG and NC	0.5	GV	350	175
2/2/2018	Conference call with GV and NC	0.5	MSG	450	225
2/5/2018	Email correspondence with opposing counsel re: trial subpoenas and finalizing pre-trial submissions	0.3	GV	350	105
2/5/2018	Finalize and file Plaintiffs proposed voir dire questions	0.4	GV	350	140
2/5/2018	File Plaintiffs proposed verdict sheet, joint pre-trial order, and joint proposed jury instructions	0.2	GV	350	70
2/5/2018	Draft trial subpoena for Clark Simpson	0.2	GV	350	70
2/5/2018	Email correspondence with opposing counsel	0.1	GV	350	35
2/5/2018	TC with client, review of all exhibits, review of latest changes to JPTO, drafted voir dire. Discussion with client about various witnesses, discussion re: witness order. Research on Stacy Hall issue. Research on service of Jandovitz, Clark, Gaffney and Fred P. Review of "issues to be tried" Section of JTPO and research. Outlined Jandovitz cross examination	9.4	MSG	450	4230
2/5/2018	Review file, compile documents, pleadings, discovery necessary for pre-trial submissions; Draft subpoenas and notices of intent	2	PR	125	250
2/6/2018	Prep for final pre-trial conference	0.7	GV	350	245
2/6/2018	Draft and send for service subpoenas for Robert Jandovitz and Debbie Lafaro	0.5	GV	350	175
2/6/2018	Review of JPTO, review of all subpoenas, review of Motion in limine, review of problem areas for pretrial conference, review of Summary judgment motion and decision and impact on	3.4	MSG	450	1530
2/6/2018	Compile Trial Exhibits	3	PR	125	375

2/7/2018	Appearance at pre-trial conference	1.2	GV	350	420
2/7/2018	Create trial binders of Plaintiff's exhibits	3	GV	350	1050
2/7/2018	Email correspondence with opposing counsel	0.1	GV	350	35
2/7/2018	Attend court- pre-trial conference	1.2	MSG	450	540
2/8/2018	Discussions and email corr with client, research and search on potential witnesses for trial to subpoena	1.2	MSG	450	540
2/9/2018	Amend Joint pre-trial order and file	0.3	GV	350	105
2/10/2018	Prepared for trial, prepared for cross of Jandovitz	7.4	MSG	450	3330
2/11/2018	Prepared for trial, cross of Jandovitz, review of all Jandovitz possible exhibits and impeachment documents	8.8	MSG	450	3960
2/12/2018	Review of order granting leave to file document	0.2	MSG	450	90
2/13/2018	Review exhibits and Fred Panniccia affidavit to begin putting together direct examination outline	1	GV	350	350
2/14/2018	Discussions with client re: witnesses and subpoenaing witnesses	0.3	MSG	450	135
2/14/2018	Email corr with opposing counsel	0.1	MSG	450	45
2/14/2018	Review e-mails between all counsel re: upcoming trial; Prepare Subpoenas for following parties to appear and testify; at trial Clark Simpson, Fred Paniccia, Robert Jandovitz, Debra LaFaro , Dr. Alfonso, Adolph McBean ,Juan Vizcaino; E-mails to and from Rustin (process server) re: completion of service of all subpoenas; Communicate with Montefiore Hospital re: subpoena on Dr Alfsonso; Multiple phone calls with client re: to documents needed for upcoming trial; Review Joint Pre-Trial order and print out and tab 44 exhibits for plaintiff and 30 exhibits for defendants in preparation for trial; Print and bind Dr. Goldstein's transcript, prepare letter and send to him re: preparation to testify at trial; Prepare letter to judge and proposed order to allow courtroom connect to set-up in courtroom for trial and e-file same; Prepare letter to judge and e-file same requesting trial attorneys access to allow electronics in the courtroom; Communicate with Jeff Gibbs (Courtroom Connect) to set up- internet in Court room	6	PR	125	750
2/19/2018	Trial prep	4	GV	350	1400
2/21/2018	Email correspondence with court	0.1	GV	350	35

2/21/2018	Email correspondence with expert witness Dr. Robert Goldstein	0.1	GV	350	35
2/21/2018	Review deposition transcript of Juan Vizccaino and compare to investigation notes to determine whether to call witness at trial	2	GV	350	700
2/21/2018	Review and execute letter requesting court connect during trial	0.1	GV	350	35
2/21/2018	Review and revise opening statement	0.5	GV	350	175
2/22/2018	Finish revising and commenting on draft opening	1.2	GV	350	420
2/23/2018	Meeting with witness Fred Panniccia to prep for trial	4	GV	350	1400
2/23/2018	Review Adolph McBean deposition and begin preparing cross examination outline	3	GV	350	1050
2/24/2018	Trial prep - prepare all binders for court and counsel for use at trial, continue reviewing and preparing cross examination of Adolph McBean, review exhibits to be used for McBean cross examination	9	GV	350	3150
2/24/2018	Trial prep- discussions with witness Clark Simpson, draft outline of Simpson direct examination, phone prep with witness Simpson	12	MSG	450	5400
2/24/2018	Review Plaintiff direct examination outline, discussions with client, discussions with witness Gaffney	1.2	MSG	450	540
2/25/2018	Trial prep- finish outline for Fred Panniccia direct examination and phone prep with witness, phone prep with witness Clark Simpson, meeting with MSG and trial counsel	8	GV	350	2800
2/25/2018	Trial prep- discussion with GMV regarding Panniccia testimony, phone prep with witness Clark Simpson, meeting with GMV and trial counsel, help prep client and witness Gaffney, review opening statement	10	MSG	450	4500
2/26/2018	Trial	8	GV	350	2800
2/26/2018	Attend court - Trial	8	MSG	450	3600
2/26/2018	Prep for trial - prepare cross examination outline for Bob Jandovitz, review and revise cross examination outline for Adolph McBean, Review and revise outline for Troche cross	5	MSG	450	2250
2/27/2018	Trial	8	GV	350	2800
2/27/2018	Attend court- Trial	8	MSG	450	3600

2/27/2018	Trial prep: Revise cross-examination outline for McBean continued examination; finalize cross examination outline of Debbie Troche; finalize cross examination outline of Bob Jandovitz	6	MSG	450	2700
2/27/2018	Telephone call with Delta airlines re: flight of witness, Fred Gaffney; Create binders of transcripts for Trial	3	PR	125	375
2/28/2018	Trial	8	GV	350	2800
2/28/2018	Trial prep- Review proposed jury instruction for possible objections or comments, note all exhibits and prepare copy for jury during deliberations	2.5	GV	350	875
2/28/2018	Attend court- Trial	8	MSG	450	3600
2/28/2018	Trial prep: Review record and exhibits for possible use in Tyrone Smith cross examination, discussions with client re: status of trial and possible testimony from Tyrone Smith, Review and comment on summation, review proposed jury charge for comments/proposed revisions or objections	7	MSG	450	3150
3/1/2018	Trial	8	GV	350	2800
3/1/2018	Attend court - Trial	8	MSG	450	3600
3/2/2018	Trial	8	GV	350	2800
3/2/2018	Attend court - Trial	8	MSG	450	3600
3/2/2018	Review e-mails from the Court re: trial proceedings; jury charge and verdict; Review Jury Charge; Review Verdict; Preparation of memorandum to file re: same	0.3	PR	125	37.5
3/13/2018	Review e-mails from the Court re trial proceedings (11 e-mails)	0.3	PR	125	37.5
3/20/2018	Review trial transcripts for testimony regarding Plaintiffs emotional damages for opposition to Defendants' post-trial motion	3	GV	350	1050
3/22/2018	Review trial transcripts for testimony regarding Plaintiffs emotional damages for opposition to Defendants' post-trial motion	2	GV	350	700
4/6/2018	Review and comment on draft of opposition to post-trial motion	1.5	GV	350	525
4/6/2018	Email corr regarding opposition to post-trial motion	0.1	GV	350	35
4/6/2018	Review and comment on draft of opposition to post-trial motion	0.5	GV	350	175
4/6/2018	Review and comment on opposition to Defendant's post-trial motion	0.7	MSG	450	315

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4/7/2018 Strategy discussion with NC and research for  
remittance motion. Edited the motion, searched for  
additional citations 4.8 MSG 450 2160

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TOTAL 271255